

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HEALTH AND HUMAN SERVICES, et al.

Defendants.

Case No. 1:25-cv-11048-ADB

UNOPPOSED MOTION FOR LEAVE TO ADMIT COUNSEL *PRO HAC VICE*

Pursuant to Local Rule 83.5.3(e) of the United States District Court for the District of Massachusetts, undersigned counsel respectfully moves this Court to grant leave for L. Rachel Lerman to appear as counsel on behalf of *Amicus Curiae* The Louis D. Brandeis Center for Human Rights Under Law (the “Brandeis Center”), and to practice before this Court in the above-captioned action. As grounds for this Motion, undersigned counsel relies on the attached certification, which states:

1. L. Rachel Lerman is an attorney at the Brandeis Center, a nonprofit, non-partisan legal advocacy organization, which is located at 1717 Pennsylvania Avenue NW, Suite 1025, Washington, D.C. 20006, and her telephone number is (310) 498-3414.
2. She is a member in good standing in every jurisdiction in which she has been admitted to practice.
3. She has not been disciplined by and is not the subject of disciplinary proceedings pending in any jurisdiction in which she is a member of the bar.

4. She has not previously had a *pro hac vice* admission to this Court (or other admission for a limited purpose under this rule) revoked for misconduct.

5. She has read and agrees to comply with the Local Rules of the United States District Court for the District of Massachusetts.

Therefore, undersigned counsel respectfully moves that L. Rachel Lerman be admitted to practice before this Court *pro hac vice*.

Dated: June 21, 2025

LIBBY HOOPES BROOKS & MULVEY, P.C.

/s/ Douglas S. Brooks

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LOCAL RULE 7.1(a)(2) CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), undersigned counsel hereby certifies that the Brandeis Center conferred with counsel for the Parties and that no party opposes this motion.

/s/ Douglas S. Brooks
Douglas S. Brooks

CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the Court's CM/ECF system on June 21, 2025 and will be sent electronically to registered participants on the Notice of Electronic Filing.

/s/ Douglas S. Brooks
Douglas S. Brooks